

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN B. WILSON,  
Defendant.

Cr.No. 19-10080-LTS

**DEFENDANT JOHN WILSON'S MOTION FOR RETURN OF PASSPORTS AND  
PERMISSION TO TRAVEL FOR WORK.**

Defendant John Wilson (“Mr. Wilson”) moves that the Court authorize the Probation Department to facilitate the return of his U.S. Passports, and that the Court allow Mr. Wilson to travel as described below, with the supervision of the Probation Department. The Government has informed Mr. Wilson’s counsel that it assents to the return of his passports, and takes no position with respect to his travel in February and March, 2024.

In support of this motion Mr. Wilson states:

1. On September 29, 2023, the Court imposed as part of its sentence, that Mr. Wilson have one year of probation, including six months of home detention. The home detention will expire at the end of March, 2024. The Court also imposed 250 hours of community service at the Epiphany School. Mr. Wilson has already completed his 250 hours and is continuing his volunteer work at the school.
2. Mr. Wilson’s employment prior to his arrest in March, 2019, was as an international executive and business consultant. He is currently making efforts to return to this line of

work. In order to do so, he will need to travel and meet with prospective employers and clients, possibly in California, New York, Pennsylvania, Texas, the United Kingdom, the Netherlands, Germany and other states and countries. He expects he will need to start this out of state travel for employment in February and March, 2024, and continue it after his home confinement has ended. He expects the trips will last from 2 to 7 days, depending on the locations and number of meetings.

3. Therefore, Mr. Wilson asks that the Court approve the following:
  1. Mr. Wilson has two passports. He surrendered both to the Probation Department, which in turn surrendered them to the U.S. State Department. Per State Department rules, it will return the passports to Mr. Wilson if the Probation Department sends State a letter requesting the return. Thus, Mr. Wilson asks that the Court authorize Probation to issue this letter forthwith. Once he receives the passports, Mr. Wilson may need to apply for certain visas for business travel.
  2. Mr. Wilson expects he will shortly receive invitations to business meetings in California, New York, Texas, Germany, the United Kingdom and possibly other locations. He requests the court's authorization to begin business travel in February and March, and will provide the dates and locations to the Probation Department as the details are established. In February and March he will only travel for business purposes, and will not be accompanied by any family member. As of April 1, 2024, he asks for the ability to travel without any limitations. Mr. Wilson owns and manages a business in Los Angeles and he would like the ability to visit that location as well before April 1.

3. When the government arrested Mr. Wilson in March 2019, it ended his outside consulting employment and board service. Because of COVID and other factors, his case took much longer to resolve than most cases, and this greatly multiplied the negative impact on his employment and finances. Thus, the relief he seeks today is balanced and proportional to the context of this case.

DATED: January 30, 2024

Respectfully submitted,

*Counsel for John Wilson*

/s/ Michael Kendall  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on January 30, 2024 through the ECF system, which will send true copies to all counsel of record.

/s/ Michael Kendall  
Michael Kendall